

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**Obj. Deadline: December 12, 2023 at 4:00 p.m. (ET)**

**Hearing Date: December 19, 2023 at 2:00 p.m. (ET)**

**NOTICE OF DEBTORS' OMNIBUS MOTION FOR ENTRY OF AN ORDER  
(I) AUTHORIZING THE ASSUMPTION OF CERTAIN  
EXECUTORY CONTRACTS, (II) FIXING THE CURE COSTS  
IN CONNECTION THERETO AND (II) GRANTING RELATED RELIEF**

**PLEASE TAKE NOTICE** that, on December 5, 2023, the debtors and debtors-in-possession in the above-captioned cases (collectively, the “**Debtors**”) filed the *Debtors’ Omnibus Motion for Entry of an Order (I) Authorizing the Assumption of Certain Executory Contracts, (II) Fixing the Cure Costs in Connection Thereto and (II) Granting Related Relief* (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

**PLEASE TAKE FURTHER NOTICE** that, any responses or objections to the Motion must be in writing and filed with the Clerk of the Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801 on or before **December 12, 2023 at 4:00 p.m. (ET)**.

**PLEASE TAKE FURTHER NOTICE** that, if any objections to the Motion are received, the Motion and such objections shall be considered at a hearing before The Honorable Mary F. Walrath, United States Bankruptcy Judge for the District of Delaware, at the Court, 824 North

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<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corporation (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

Market Street, 5th Floor, Courtroom 4, Wilmington, Delaware 19801 on **December 19, 2023** at **2:00 p.m. (ET)**.

**PLEASE TAKE FURTHER NOTICE THAT, IF NO OBJECTIONS TO THE MOTION ARE TIMELY FILED IN ACCORDANCE WITH THIS MOTION, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.**

*[Remainder of Page Intentionally Left Blank]*

Dated: December 5, 2023  
Wilmington, Delaware

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| <p><u>/s/ Morgan L. Patterson</u><br/> <b>WOMBLE BOND DICKINSON (US) LLP</b><br/> Donald J. Detweiler (DE Bar No. 3087)<br/> Morgan L. Patterson (DE Bar No. 5388)<br/> 1313 North Market Street, Suite 1200<br/> Wilmington, Delaware 19801<br/> Telephone: (302) 252-4320<br/> Facsimile: (302) 252-4330<br/> don.detweiler@wbd-us.com<br/> morgan.patterson@wbd-us.com</p> <p><i>Counsel to the Debtors and Debtors in Possession</i></p> | <p><b>WHITE &amp; CASE LLP</b><br/> Thomas E Lauria (admitted <i>pro hac vice</i>)<br/> Matthew C. Brown (admitted <i>pro hac vice</i>)<br/> Fan B. He (admitted <i>pro hac vice</i>)<br/> 200 South Biscayne Boulevard, Suite 4900<br/> Miami, FL 33131<br/> Telephone: (305) 371-2700<br/> tlauria@whitecase.com<br/> mbrown@whitecase.com<br/> fhe@whitecase.com</p> <p>David M. Turetsky (admitted <i>pro hac vice</i>)<br/> 1221 Avenue of the Americas<br/> New York, NY 10020<br/> Telephone: (212) 819-8200<br/> david.turetsky@whitecase.com</p> <p>Jason N. Zakia (admitted <i>pro hac vice</i>)<br/> 111 South Wacker Drive, Suite 5100<br/> Chicago, IL 60606<br/> Telephone: (312) 881-5400<br/> jzakia@whitecase.com</p> <p>Roberto Kampfner (admitted <i>pro hac vice</i>)<br/> Doah Kim (admitted <i>pro hac vice</i>)<br/> RJ Szuba (admitted <i>pro hac vice</i>)<br/> 555 South Flower Street, Suite 2700<br/> Los Angeles, CA 90071<br/> Telephone: (213) 620-7700<br/> rkampfner@whitecase.com<br/> doah.kim@whitecase.com<br/> rj.szuba@whitecase.com</p> <p><i>Counsel to Debtors and Debtors in Possession</i></p> |
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